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Attorneys for Defendants

COUNTRYWIDE BANK, N.A. and NAZIA NAWABZADA

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Attorneys for Plaintiffs

ROSA GALINDO and MARIA GALINDO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ROSA GALINDO, MARIA GALINDO,

Plaintiffs,

vs.

FINANCO FINANCIAL, INC.;
PATRICK PATCHIN; AHMED YAMA
ASEFI, AAROON SADAT, NAZIA
NAWABZADA, COUNTRYWIDE
BANK, N.A.; JOSEPH ESQUIVEL,
PAMELA SPIKES AND DOES 1-100,

Defendants.

Case No. C07-03991

**JOINT STIPULATION RE
EXTENDING TIME TO ANSWER
COMPLAINT AND [PROPOSED]
ORDER**

PURSUANT TO CIVIL LOCAL RULE 6-2, Plaintiffs ROSA GALINDO
and MARIA GALINDO, and Defendants COUNTRYWIDE BANK, N.A. and
NAZIA NAWABZADA, through their undersigned counsel of record, hereby

1 stipulate as follows:

2 WHEREAS, Plaintiffs filed this action in the Superior Court of California,
3 County of Alameda, on June 29, 2007;

4 WHEREAS, on August 2, 2007, Defendants Countrywide N.A. and Nazia
5 Nawabzada filed a Notice of Removal, removing this action to the United States
6 District Court for the Northern District of California;

7 WHEREAS, Plaintiffs and Defendants stipulated to an extension for
8 Defendants to answer the Complaint, to and including September 14, 2007;

9 WHEREAS, Defendants are now substituting in new counsel of record;

10 WHEREAS, Plaintiffs and Defendants agree that judicial economy and the
11 interests of the parties in avoiding unnecessary expenses would be served and
12 promoted by briefly continuing Defendants' time to answer the Complaint; and

13 WHEREAS, continuing Defendants' time to answer the Complaint as
14 stipulated below will not alter any other dates scheduled in this action;

15 IT IS HEREBY STIPULATED AND AGREED by Plaintiffs and Defendants,
16 subject to the approval of the Court, that the last day for Defendants Countrywide
17 Bank, N.A., and Nazia Nawabzada to answer the Complaint is continued to and
18 including October 4, 2007.

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1 Plaintiffs and Defendants respectfully request the Court to approve the
2 stipulation to extend Defendants' time to answer the Complaint.

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4 Dated: September ___, 2007

WELTIN LAW OFFICE, P.C.
PHILIP R. WELTIN
DANIEL R. WELTIN

7
8 By: _____
Daniel R. Weltin
9 Attorneys for Plaintiffs Rosa Galindo
10 and Maria Galindo

11
12 Dated: September 13, 2007

BRYAN CAVE LLP
JOHN W. AMBERG
HEATHER S. ORR

15 By: _____
16 John W. Amberg
17 Attorneys for Defendants Countrywide
18 Bank, N.A. and Nazia Nawabzada

19
20 **[PROPOSED] ORDER**

21 Based on the foregoing and good cause appearing therefor, it is ordered:
22 Defendants Countrywide Bank, N.A. and Nazia Nawabzada shall have to and
23 including October 4, 2007 in which to answer the Complaint.

24 IT IS SO ORDERED.

25 Dated: _____

26 DISTRICT JUDGE EDWARD M. CHEN
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1 Plaintiffs and Defendants respectfully request the Court to approve the
2 stipulation to extend Defendants' time to answer the Complaint.

3
4 Dated: September 13, 2007

WELTIN LAW OFFICE, P.C.
PHILIP R. WELTIN
DANIEL R. WELTIN

7
8 By: 

Daniel R. Weltin
Attorneys for Plaintiffs Rosa Galindo
and Maria Galindo

9
10
11
12 Dated: September ____, 2007

BRYAN CAVE LLP
JOHN W. AMBERG
HEATHER S. ORR

15 By: _____

John W. Amberg
Attorneys for Defendants Countrywide
Bank, N.A. and Nazia Nawabzada

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19
20 **[PROPOSED] ORDER**

21 Based on the foregoing and good cause appearing therefor, it is ordered:
22 Defendants Countrywide Bank, N.A. and Nazia Nawabzada shall have to and
23 including October 4, 2007 in which to answer the Complaint.

24 IT IS SO ORDERED.

25 Dated: _____

26 DISTRICT JUDGE EDWARD M. CHEN
27
28

PROOF OF SERVICE

Rosa Galindo, et al. v. Financo Financial, Inc., et al.
Case No.: C07-03991

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My e-mail address is jcchiri@bryancave.com.

On September 14, 2007, I caused the following document(s) described as: **JOINT STIPULATION RE EXTENDING TIME TO ANSWER COMPLAINT AND [PROPOSED] ORDER**; to be served upon each interested party in this action, as follows:

☒ **VIA ELECTRONIC SERVICE – CRC 2060(c)** The document was served via electronic transfer by ECF upon the recipients designated on the transaction receipt located on the ECF website. Each transmission was reported as complete and without error.

Executed on September 14, 2007, at Santa Monica, California. I declare under penalty of perjury that the foregoing is true and correct.

/s/ Judith C. Chiri
Judith C. Chiri

Bryan Cave LLP
120 Broadway, Suite 300
Santa Monica, California 90401-2386